

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

ROBERT BEASLEY,

Petitioner, and

**STATE OF OHIO,
STATE OF COLORADO,
STATE OF ILLINOIS,
STATE OF NEW YORK,
STATE OF NORTH CAROLINA
STATE OF TENNESSEE,
COMMONWEALTH OF VIRGINIA
STATE OF WEST VIRGINIA,
DISTRICT OF COLUMBIA, and
UNITED STATES OF AMERICA,**

Plaintiffs,

v.

**Civil Action No. 1:23-cv-100
Hon. John P. Bailey**

**NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,**

Defendant.

**PETITIONER’S MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Petitioner Robert “Robby” Beasley, by counsel, moves this Court to enforce the Final Judgment and Permanent Injunction issued on August 30, 2024, by this Court, by requesting a Temporary Restraining Order and Preliminary Injunction pursuant to Fed. R. Civ. P. 65. Petitioner requests that Defendant, the National Collegiate Athletic Association (“NCAA”), be enjoined from (1) violating Paragraph 23 of the Consent Decree, and (2) enforcing its Bylaw 12.8.3.1 (“Minimum Amount of Competition”) with regard to Petitioner and similarly situated college athletes as that Bylaw conflicts with the Consent Decree’s stated relief. In the alternative, Petitioner requests that the Court modify the Consent Decree to prohibit the NCAA from denying

Petitioner the ability to compete in the next college basketball season of 2025-2026.

A Memorandum in Support of this Motion to support the Petitioner's requested relief has been filed contemporaneously with this Motion.

ROBERT BEASLEY, Petitioner

By Counsel

/s/ Mychal S. Schulz

Mychal S. Schulz, Esquire (WVSB #6092)

Babst Calland, P.C.

300 Summers Street, Suite 1000

Charleston, WV 25301

681.205.8888

681.205.8814 fax

mschulz@babstcalland.com

/s/ Jon T. King (pro hac application pending)

Jon T. King (Cal. Bar 205073)

Counsel for Petitioner

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

ROBERT BEASLEY,

Petitioner, and

**STATE OF OHIO,
STATE OF COLORADO,
STATE OF ILLINOIS,
STATE OF NEW YORK,
STATE OF NORTH CAROLINA
STATE OF TENNESSEE,
COMMONWEALTH OF VIRGINIA
STATE OF WEST VIRGINIA,
DISTRICT OF COLUMBIA, and
UNITED STATES OF AMERICA,**

Plaintiffs,

v.

**Civil Action No. 1:23-cv-100
Hon. John P. Bailey**

**NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,**

Defendant.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Petitioner's Motion for Temporary Restraining Order and Preliminary Injunction* was filed on April 7, 2025 electronically through the Court's CM/ECF system, which will send notice of the electronic filing to all counsel of record.

/s/ Mychal S. Schulz

Mychal S. Schulz, Esquire (WVSB #6092)